

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**CONNIE LAKEY BAJULA,**

*Plaintiff,*

**V.**

**SAN JACINTO COLLEGE  
DISTRICT; AND  
CHIEF WILLIAM F. TAYLOR**

*Defendants.*

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**NO. 4:13-cv-01546**

**PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A), Plaintiff CONNIE LAKEY

BAJULA hereby makes the following required disclosures:

- 1. THE NAME, AND IF KNOWN, THE ADDRESS AND TELEPHONE NUMBER OF EACH INDIVIDUAL LIKELY TO HAVE DISCOVERABLE INFORMATION THAT THE DISCLOSING PARTY MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES, UNLESS SOLELY FOR IMPEACHMENT**

A majority of the individuals likely to have possession of discoverable information which the Plaintiff believes support her claims or defenses are employees of the Defendant and are in the exclusive possession and control of the Defendant. Plaintiff reserves the right to supplement this disclosure, as discovery commences. Subject to the above, Plaintiff discloses the following information:

Witness	Subject of Information
Monica Vasquez 8060 Spencer Hwy Pasadena, Texas 77505	Knowledge of the discrimination and relation experienced by employees of San Jacinto College.
Berenice Spencer	Knowledge of the discrimination and relation experienced by

8060 Spencer Highway Pasadena, Texas 77505	employees of San Jacinto College.
Claude Ludwig 8060 Spencer Hwy Pasadena, Texas 77505	Knowledge of the discrimination and relation experienced by employees of San Jacinto College.
Isaac Villareal 8718 Cielto Baytown, Texas 77520	Knowledge of the discrimination and relation experienced by employees of San Jacinto College.
Patricia Bradley 8060 Spencer Hwy Pasadena, Texas 77505	Knowledge of the discrimination and relation experienced by employees of San Jacinto College.
Michael Taylor 17207 Trace Glen Lane Houston, Texas 77083	Knowledge of the discrimination and relation experienced by employees of San Jacinto College.
Heath Cariker	Knowledge of the discrimination and relation experienced by employees of San Jacinto College.
Chief Jeffery Van Slyke	Knowledge of the discrimination and relation experienced by employees of San Jacinto College.
All past and current Officers of San Jacinto College Police Department	Knowledge of the discrimination and relation experienced by employees of San Jacinto College.
Katherine Mize Mize, Minces & Clark, PC 808 Travis Street, Suite 453 Houston, Texas 77002	Knowledge of the reasonable rate in the Houston metropolitan area for attorney's fees as based upon her knowledge of Plaintiff's Counsels and their skill and experience. Plaintiff reserves the right to designate this individual as an expert as to attorney's fees.
Margaret Harris Butler & Harris 1007 Heights Blvd Houston, Texas 77008 713-526-5677	Knowledge of the reasonable rate in the Houston metropolitan area for attorney's fees as based upon her knowledge of Plaintiff's Counsels and their skill and experience. Plaintiff reserves the right to designate this individual as an expert as to attorney's fees.

margie@butlerharris.com	
Kim K. Ogg The Ogg Law Firm, PC 3215 Mercer, Suite 100 Houston, Texas 713-974-1600 kimogg@ogglawfirm.com	Knowledge of the number of hours expended on this case, in light of application of business judgment. Plaintiff reserves the right to designate this individual as an expert as to attorney's fees.
R. Scott Poerschke The Ogg Law Firm, PC 3215 Mercer, Suite 100 Houston, Texas 713-974-1600 scott@ogglawfirm.com	Knowledge of the number of hours expended on this case, in light of application of business judgment. Plaintiff reserves the right to designate this individual as an expert as to attorney's fees.
Robert McKnight Marek, Griffin & Knaupp 203 N. Liberty Street Victoria, Texas 77901 361-573-5500 mcknightr@lawmgk.com	Knowledge of the number of hours expended on this case, in light of application of business judgment. Knowledge of the reasonable rate in the Houston metropolitan area for attorney's fees as based upon his knowledge of Plaintiff's Counsels and their skill and experience. Plaintiff reserves the right to designate this individual as an expert as to attorney's fees.

**2. A COPY—OR A DESCRIPTION BY CATEGORY AND LOCATION—OF ALL DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS THAT THE DISCLOSING PARTY HAS IN ITS POSSESSION, CUSTODY, OR CONTROL AND MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES, UNLESS THE USE WOULD BE SOLELY FOR IMPEACHMENT**

Various documents and information required for disclosure are in the exclusive possession and control of the Defendant or Third Parties and are yet unavailable to Plaintiff. Plaintiff reserves the right to supplement this disclosure, and to make all documents and evidentiary material associated with such supplementation available to the Defendant for

inspection and copying pursuant to Rule 34, as discovery commences. Subject to the above, Plaintiff discloses the following documents:

Category	Location
Plaintiff's Employee File maintained by the San Jacinto College District	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to the Defendants.
Plaintiff's Employee File maintained by the San Jacinto College Police Department (if file is different from the file maintained by the San Jacinto College District)	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to the Defendants.
Documents relating to all promotions received by the Plaintiff, including application submitted by the Plaintiff and all documents reviewed by Human Resources Department and the Chief.	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to the Defendants.
Documents relating to all demotions received by the Plaintiff, including all documents reviewed by Human Resources Department and the Chief.	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to the Defendants.
Plaintiff's payroll and benefit records for the entire period of Plaintiff's employment at San Jacinto College District (if not contained in Plaintiff's employee file(s))	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to the Defendants.
Documents relating to all grievances filed by Plaintiff.	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to the Defendants.
Documents relating to all complaints filed or made against Plaintiff.	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to the Defendants.
Statistics regarding the race of all officers employed by the San Jacinto College Police Department for the entire period of Plaintiff's employment at San Jacinto College District.	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to the Defendants.
Statistics regarding the sex of all officers employed by the San Jacinto College Police Department for the entire period of Plaintiff's employment at San Jacinto	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to

College District.	the Defendants.
All digital communications as referenced and requested to be produced in Plaintiff's Original Complaint.	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to the Defendants.
Employee files of the San Jacinto College District who experienced discrimination and retaliation.	San Jacinto College District Human Resources Department, San Jacinto College Police Department, and/or other location(s) known to the Defendants.

**3. A COMPUTATION OF EACH CATEGORY OF DAMAGES CLAIMED BY THE DISCLOSING PARTY—WHO MUST ALSO MAKE AVAILABLE FOR INSPECTION AND COPYING AS UNDER RULE 34 THE DOCUMENTS OR OTHER EVIDENTIARY MATERIAL, UNLESS PRIVILEGED OR PROTECTED FROM DISCLOSURE, ON WHICH EACH COMPUTATION IS BASED, INCLUDING MATERIALS BEARING ON THE NATURE AND EXTENT OF INJURIES SUFFERED;**

Plaintiff has not yet fully computed her damages, nor can she do so absent discovery, as various documents and information required for Plaintiff's computation are in the exclusive possession and control of the Defendant or Third Parties and are yet unavailable to Plaintiff. Plaintiff reserves the right to supplement this disclosure, and to make all documents and evidentiary material associated with such supplementation available to the Defendant for inspection and copying pursuant to Rule 34, as discovery commences and prior to its conclusion.

**4. FOR INSPECTION AND COPYING AS UNDER RULE 34, ANY INSURANCE AGREEMENT UNDER WHICH AN INSURANCE BUSINESS MAY BE LIABLE TO SATISFY ALL OR PART OF A POSSIBLE JUDGMENT IN THE ACTION OR TO INDEMNIFY OR REIMBURSE FOR PAYMENTS MADE TO SATISFY THE JUDGMENT.**

Plaintiff does not know of any information or documents responsive to this request at this time. Plaintiff reserves the right to supplement this disclosure, and to make all documents and evidentiary material associated with such supplementation available to the Defendant for inspection and copying pursuant to Rule 34, as discovery commences.

Respectfully submitted,

**THE OGG LAW FIRM, PLLC**

/s/ Kim K. Ogg

**KIM K. OGG**, Attorney In Charge

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